STATE OF SOUTH CAROLINA BEFORE THE PUBLIC SERVICE COMMISSION DOCKET NO. 2017-370-E

In Re: Joint Application and Petition of)
South Carolina Electric & Gas Company)
and Dominion Energy, Incorporated for)
Review and Approval of a Proposed) PETITION TO INTERVENE
Business Combination between SCANA)
Corporation and Dominion Energy,)
Incorporated, as May Be Required, and for)
a Prudency Determination Regarding the)
Abandonment of the V.C. Summer Units 2)
& 3 Project and Associated Customer)
Benefits and Cost Recovery Plans)

I, William T. Dowdey, hereby petition the Public Service Commission of South Carolina ("Commission") to intervene in the above-captioned docket pursuant to R. 103-825 of the Commission's rules. In support of this petition, I state as follows:

- My name is William T. Dowdey. I reside at 811 Jefferson Street in West Columbia, SC. This address is served by South Carolina Electric & Gas ("SCE&G").
- 2. For purposes of official notifications, my mailing address is as follows:

William T. Dowdey 811 Jefferson St West Columbia SC 29169

- I have been an SCE&G electric customer since 2003. I have endured all nine rate hikes related to the VC Summer Nuclear Project.
- 4. I have a direct financial interest in the outcome of these proceedings.
- 5. I believe that SCE&G and its parent company SCANA knew, or should have known, that the costs of the project were being imprudently incurred.

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- I believe that SCE&G failed to disclose material information related to the VC Summer Nuclear project, including the Bechtel Project Assessment Report (2015 draft and 2016 final version).
- 7. Based on the data contained in the Bechtel Project Assessment Reports, I believe the SCE&G submitted capital cost estimates and construction schedules to the Commission that they knew to be false and without basis. SCE&G has never been able to meet the Guaranteed Substantial Completion dates for units 2 and 3. They knew or should have known this information.
- 8. In 2012, SCE&G was informed by its contractor, Westinghouse Electric Company, that they would not use licensed engineers to design the reactors. This decision later led to substantial, adverse consequences for the VC Summer Nuclear project.
- In 2011, an internal Westinghouse document admitted that the AP1000 reactor design was incomplete and at risk.
- 10. SCE&G, by its own admission, is not in compliance with the approved cost and construction schedules, and is therefore not entitled to cost recovery under the Base Load Review Act.
- 11. I will be representing myself in this proceeding.
- 12. I believe that a fair and reasonable settlement would, at the very least, involve a substantial reduction in electric rates for SCE&G ratepayers.
- 13. I wish to work with all parties to reach fair and reasonable settlement.
- 14. I petition the Commission to become an intervenor and be made a party of record in the above-captioned docket and for any other relief that may be just and reasonable.

Respectfully submitted this 16th day of January, 2018.

William T. Dowdey

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In Re: Joint Application and Petition of)	
South Carolina Electric & Gas Company)	
and Dominion Energy, Incorporated for)	
Review and Approval of a Proposed)	CERTIFICATE OF SERVICE
Business Combination between SCANA)	
Corporation and Dominion Energy,)	
Incorporated, as May Be Required, and for)	
a Prudency Determination Regarding the)	
Abandonment of the V.C. Summer Units 2)	
& 3 Project and Associated Customer)	
Benefits and Cost Recovery Plans)	

I certify that the following persons have been served with one (1) copy of the foregoing Petition to Intervene by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

Shannon Bowyer Hudson, Esq. Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 shudson@regstaff.sc.gov

K. Chad Burgess, Esq.
South Carolina Electric & Gas Company
220 Operation Way – MC C222
Cayce, SC 29033
chad.burgess@scana.com

This 16th day of January, 2018

William T. Dowdey